REMOVAL ASSESSMENT CHECKLIST

(Utilize site sketches and pictures for documentation.)

1. **Indicators of potential exposure to hazardous substances:**

Exposure to hazardous substances at the Millipore site by trespassers or nearby residents is unlikely. Observations made during the on-site reconnaissance conducted by Region 2 SAT in December 2004, indicated that the Millipore facility is clean and well maintained. The site is active and access is restricted by fencing and a guard posted at the front gate. Air monitoring using a PID indicated no elevated organic vapor concentrations in the ambient air.

2. **Types of containers, impoundments or other storage systems (Note tags, labels, markings, etc.):**

Solid and liquid wastes generated at the site are stored on pallets and in drums on a concrete pad with secondary containment. Liquid waste is also treated by an on-site WWTP with aeration before discharging to a subsurface leachfield.

3. **Condition of waste containers and storage systems:**

The solid waste storage area was found to be clean and well maintained. The concrete pad is roofed, fenced, and surrounded by curbing to contain spills. Runoff is routed away from the storage area through spillways and pipes. During the December 2004 on-site reconnaissance, the WWTP appeared to operating normally. No leachate was observed in the vicinity of the active leachfield.

4. **Physical condition of materials on site:**

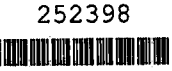
Hazardous waste generated by Millipore is in solid and liquid form.

5. **Reactive, incompatible or highly corrosive substances:**

During the on-site reconnaissance conducted by Region 2 SAT on 20 December 2004, no incompatible or highly corrosive substances were noted.

6. **Land features and natural wind barriers:**

The Millipore facility occupies approximately 30.5 acres on a hillside sloping east toward the on-site stream. The northern portion of the facility adjacent to Route 172 is flat with the slope increasing to the south and east. The active leachfield is situated on a hillside that slopes west toward the on-site stream and the active portion of the facility. The stream is



located in a valley between the two slopes. There are no natural wind barriers on the site.

7. **Potential dispersion pathways:**

Any residual soil/sediment contamination would likely disperse through groundwater and surface water. Approximately 7,000 people obtain drinking water from groundwater sources within 4 miles of the site. The surface water pathway associated with the site contains fisheries and a drinking water intake located approximately 5.5 miles downstream of the PPE.

8. **Presence and condition of on-site buildings:**

The Millipore site is an active facility that was observed to be clean and well maintained. On-site buildings were observed to be in good condition.

9. **Safety hazards (physical, chemical and biological):**

No physical or biological hazards were identified by Region 2 SAT. Residual VOC and metal contamination of soil/sediment may be present as a result of past discharges from the on-site WWTP.

10. **Site security:**

The Millipore facility is completely fenced and a guard is posted at the front gate.

Completed by: _____ Date 1/21/05

Scott Snyder

ATTACHMENT A

PHOTO DOCUMENTATION
MILLIPORE CIDRA, INC., ON-SITE RECONNAISSANCE
APRIL 2002 and DECEMBER 2004

PHOTOGRAPHIC LOG
MILLIPORE CIDRA, INC.
CIDRA, PUERTO RICO

Photo 1. **View of the northwest side of the waste storage area.**

Photo 2. **Discharge point area .**

PHOTOGRAPHIC LOG
MILLIPORE CIDRA, INC.
CIDRA, PUERTO RICO

Photo 3. **Empty metal and plastic 55-gallon drums in the north side of the waste storage area.**

Photo 4. **Sump/pit in the waste storage area.**

PHOTOGRAPHIC LOG
MILLIPORE CIDRA, INC.
CIDRA, PUERTO RICO

Photo 5. **Pallets of dry waste in the waste storage area.**

Photo 6. **Aeriation pond part of Millipore's wastewater treatment plant.**

PHOTOGRAPHIC LOG
MILLIPORE CIDRA, INC.
CIDRA, PUERTO RICO

Photo 7. **Liquid wastes stored inside the waste storage area.**

Photo Documentation
On-Site Reconnaissance, Millipore Cidra, Inc.
20 December 2004

Photo No. 12-20-01: Solvent storage tanks (raw material); looking SE, 0935 hours.

Photo Documentation
On-Site Reconnaissance, Millipore Cidra, Inc.
20 December 2004

Photo No. 12-20-02: Former hazardous waste storage area (HWSA); looking N, 0940 hours.

Photo Documentation
On-Site Reconnaissance, Millipore Cidra, Inc.
20 December 2004

Photo No. 12-20-04: Wastewater treatment plant (WWTP); looking S, 1005 hours.

Photo Documentation
On-Site Reconnaissance, Millipore Cidra, Inc.
20 December 2004

Photo No. 12-20-08: Wastewater treatment plant (WWTP) leach field; looking S, 1050 hours.